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PUBLIC UTILITIES
COMMISSION

BEFORE THE
PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

In the Matter of the Application of)
HAWAIIAN ELECTRIC COMPANY, INC.)
For Approval of Rate Increases and)
Revised Rate Schedules and Rules)

DOCKET NO. 2008-0083

DEPARTMENT OF DEFENSE'S THIRD
SUBMISSION OF INFORMATION REQUESTS.

AND

CERTIFICATE OF SERVICE

GAYLE B CHESTNUT
DAVID C. COKER
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Naval Facilities Engineering Command, Pacific
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Telephone (808) 472-1485

ATTORNEYS FOR
DEPARTMENT OF DEFENSE

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PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

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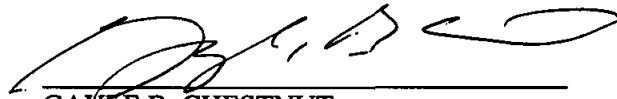
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DEPARTMENT OF DEFENSE'S THIRD
SET OF INFORMATION REQUESTS
TO HAWAIIAN ELECTRIC COMPANY, INC.

COMES NOW, DEPARTMENT OF DEFENSE by and through its undersigned attorneys and
hereby submits its Third Set of Information Requests to Hawaiian Electric Company, Inc.

DATED: Honolulu, Hawaii, October 7, 2008.



GAYLE B. CHESTNUT
DAVID C. COKER
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Naval Facilities Engineering Command, Pacific
258 Makalapa Drive, Suite 100
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Telephone (808) 472-1195

ATTORNEYS FOR
DEPARTMENT OF DEFENSE

DOCKET NO. 2008-0083

DEPARTMENT OF DEFENSE'S THIRD

SUBMISSION OF INFORMATION REQUESTS

TO HAWAIIAN ELECTRIC COMPANY, INC.

INSTRUCTIONS

In order to expedite and facilitate Department of Defense's review and analysis in the above matter, the following is requested:

1. For each response, HECO should identify the person who is responsible for preparing the response as well as the witness who will be responsible for sponsoring the response should there be an evidentiary hearing;
2. Unless otherwise specifically requested, for applicable schedules or workpapers, HECO should provide hard copies of each schedule or workpaper together with one copy of each such schedule or workpaper on electronic media in a mutually agreeable format (e.g., Excel and Quattro Pro, to name two examples); and
3. When an information request makes reference to specific documentation used by HECO to support its response, it is not intended that the response be limited to just the specific document referenced in the request. The response should include any non-privileged memoranda, internal or external studies, assumptions, HECO instructions, or any other relevant authoritative source which HECO used.
4. Should HECO claim that any information is not discoverable for any reason:
 - a. State all claimed privileges and objections to disclosure;
 - b. State all facts and reasons supporting each claimed privilege and objection;
 - c. State under what conditions HECO is willing to permit disclosure to Department of Defense (e.g., protective agreement, review at business offices, etc.); and

- d. If HECO claims that a written document or electronic file is not discoverable, besides complying with subparagraphs 4(a-c), identify each document or electronic file, or portions thereof, that HECO claims are privileged or will not be disclosed, including the title or subject matter, the date, the author(s) and the addressee(s).
5. Please provide each response in electronic format (if available) as well as paper. Please provide two paper copies of each response, with one copy going directly via overnight delivery to DOD at the following address:

Dr. Khojasteh Davoodi
NAVFAC HQ ACQ-URASO
1322 Patterson Avenue, S.E., Suite 1000
Washington Navy Yard
Washington, D.C. 20374-5065
E-mail: Khojasteh.Davoodi@navy.mil
Ph. (202) 685-3319
Fax: (202) 433-7159

and one copy going directly via overnight delivery to DOD's consultant at the following address:

Ralph Smith
Larkin & Associates
15728 Farmington Road
Livonia, MI 48154
Email: RSmithLA@aol.com
Ph. (734) 522-3420
Fax: 734-522-1410

Please also provide responses in electronic format to Dr. Davoodi and Larkin & Associates at the e-mail addresses above, and to Mr. Gayle Chestnut at gayle.chestnut@navy.mil.

DEPARTMENT OF DEFENSE'S THIRD SET OF INFORMATION REQUESTS
TO HAWAIIAN ELECTRIC COMPANY, INC.

DOCKET NO. 2008-0083

The following information requests are directed to HECO.

- DOD-77 Please provide a copy of all of the data requests HECO has received from other parties to date.
- DOD-78 Please provide HECO's responses to all Consumer Advocate and other parties' (if any) data requests issued to date.
- DOD-79 Please provide a copy of all discovery requests issued by other parties from this point forward, and also provide HECO's responses to such discovery to DOD simultaneously with when HECO provides such responses to the issuing party.
- DOD-80 To the extent not filed by HECO as part of its filing or in the response to DOD-78, please provide all Excel files and supporting workpapers for HECO witness testimony and their exhibits.
- DOD-81 Refer to HECO-1806 and HECO-1806(a)
- a. Please identify all depreciation and amortization expenses included by HECO in its working cash calculation.
 - b. Has HECO excluded depreciation expense in its working cash calculation? If so, explain fully why depreciation expense was excluded.
 - c. Has HECO excluded amortization expense in its working cash calculation? If so, explain fully why amortization expense was excluded.

d. Is HECO aware of any prior Commission decisions which address how non-cash items such as depreciation and amortization expense are to be treated in the calculation of working cash? If so, please identify each such order.

e. In any of its most recent three rate cases, has HECO been allowed to include non-cash items such as depreciation and amortization expense in the calculation of working cash? If so, please provide the calculation of working cash in each such case, and specifically identify the amounts of depreciation and amortization expense that HECO included in its calculation of working cash in each case.

DOD-82

Interest deduction. Refer to HECO-WP-1602.

a. Refer to HECO-WP-1602, page 2 of 10. What is the amount of (1) interest on long-term debt expense, (2) interest expense on short-term debt, and (3) interest expense on hybrid securities?

b. Has HECO included any Construction Work in Progress (CWIP) in its proposed rate base? If so, please identify the amounts of CWIP that HECO has included.

c. Has HECO included any other amounts in rate base that accrue AFUDC? If so, please identify the amounts that HECO has included.

d. Please identify all AFUDC in the test year, broken out between (1) equity AFUDC and (2) debt AFUDC.

DOD-83

Refer to HECO-1122.

a. Please show all results under HECO's pension tracking mechanism, including all deferrals and rate impacts, actual and as projected through December 31, 2009. Show in detail by month. If exact amounts are not available, provide HECO's best estimates and show in detail how such estimates were derived.

b. Please show all results under HECO's OPEB tracking mechanism, including all deferrals and rate impacts, actual and as projected through December 31, 2009. Show in detail by month. If exact amounts are not available, provide HECO's best estimates and show in detail how such estimates were derived.

DOD-84

For all pension funding contributions made by HECO from 1999 through 2008, please identify the amount, payment date, and pension measurement year to which each such payment pertains.

DOD-85

Has HECO filed a Pension Funding Study for 2008 or 2009? If so, please provide a complete copy of such studies.

DOD-86

Refer to HECO T-7 at page 48, lines 16-23. Please state the number of actual PSO&M Department filled positions for each category as of September 30, 2008.

DOD-87

Refer to HECO-1503.

a. Please provide the equivalent page showing actual employee counts for January through September 2008.

b. As of September 30, 2008, please identify by department, the number of vacant positions.

c. As of August 31, 2008, please identify by department, the number of vacant positions.

DOD-88 EEI. Please break out the amount of Edison Electric Institute (EEI) dues in 2008 into the following:

- a. Core dues
- b. Utility Solid Waste Activities Group (USWAG) membership dues
- c. Industry Structure Separately Funded Activities dues
- d. Environment Structure Separately Funded Activities dues

DOD-89 EEI. Please break out the amount of actual 2007 EEI dues into the following:

- a. Core dues
- b. Utility Solid Waste Activities Group (USWAG) membership dues
- c. Industry Structure Separately Funded Activities dues
- d. Environment Structure Separately Funded Activities dues

DOD-90 EEI

- a. Please provide EEI invoices for 2007 and 2008.
- b. Please show all amounts recorded by HECO for EEI in 2007 and 2008 by account and type of EEI dues. This would include all EEI dues that HECO

recorded in operating expense accounts and below-the-line lobbying expense accounts (e.g., Account 426).

c. Please show in detail how HECO determined the amount of EEI dues to be recorded to below-the-line accounts for 2007 and 2008 actual, and for its estimated 2009 test year EEI expense.

d. Please provide all communications from EEI in 2007 and 2008 relating to identification of the portions of EEI dues relating to influencing legislation and EEI dues-funded activities that are considered "non-deductible" for federal income tax purposes.

e. Please provide breakouts of EEI dues for each year 2006, 2007 and 2008 into the NARUC specified operating expense categories: (1) legislative advocacy, (2) legislative policy research, (3) regulatory advocacy, (4) regulatory policy research, (5) advertising, (6) marketing, (7) utility operations and engineering, (8) finance, legal, planning and customer service, and (9) public relations.

DOD-91

Refer to the response to CA-IR-3 T-11.

a. Have all expenses related to "restricted stock" and stock based compensation, stock options, and incentive compensation been removed from test year operating expenses?

b. If the answer to part a is negative, please identify, quantify (showing the amounts remaining in each account) and explain all remaining amounts for

“restricted stock,” stock options, and incentive compensation and other forms of stock based compensation.

DOD-92

On October 3, 2008, the U.S. House and Senate have approved and President Bush is expected to sign a Financial Bailout Bill that includes \$150 Billion in tax benefits. Please identify, quantify and explain in detail how these tax changes are expected to impact HECO for the 2009 test year. Include all analysis and detailed supporting workpapers.

CERTIFICATE OF SERVICE

I hereby certify that one copy of the foregoing document was duly served upon the following parties, by personal service, hand-delivery, and/or U.S. mail, postage prepaid, and properly addressed pursuant to HAR sec. 6-61-21(d).

Ms. Catherine P. Awakuni
Executive Director
Division of Consumer Advocacy
Department of Commerce and Consumer Affairs
P. O. Box 541
Honolulu, HI 96809

2 Copies

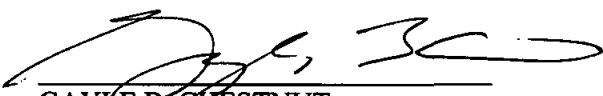
Mr. William A. Bonnet
Vice President - Government and Community Affairs
Hawaiian Electric Company, Inc.
P. O. Box 2750
Honolulu, HI 96840-0001

Mr. Dean K. Matsuura
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Counsel for Hawaiian Electric Company, Inc.

DATED: October 7, 2008, Honolulu, Hawaii



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Associate Counsel
Naval Facilities Engineering Command,
Pacific